

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

UNITED STATES OF AMERICA

Plaintiff,

vs.

NICKOLAS BURCH

Defendant.

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No. 12 CR 00575-1

Judge Thomas M. Durkin

UNOPPOSED EMERGENCY MOTION TO MODIFY BOND

Now comes the defendant, NICKOLAS BURCH, by and through his attorney, STEVEN R. HUNTER, and moves this Honorable Court to modify the conditions of his bond, and to allow the defendant to attend a funeral, burial and repass as described below. In support of this motion the defendant states as follows;

1. That Nikolas Burch is charged with a violation of Mandatory Supervised release.
2. That he is on bond with a condition that he is on electronic monitoring and that he not leave his home except with the permission of probation and the court to meet with his attorney, attend court, and a few other limited exceptions.
3. He has been on electronic monitoring since May 7, 2021.
4. That Mr. Burch wishes to attend the funeral and repass of his brother, Ralph Banks.
5. That the funeral is scheduled to take place on September 4, 2021 at Corbin Colonial Funeral Chapel, located at 5345 W. Madison Street, Chicago, Illinois. The funeral is scheduled to begin at 10 a.m. until 3 p.m.. The burial and repass follows at All Saint cemetery, 700 North River Road, Des Plaines, Illinois 60616 from 3 p.m. to 8 p.m. (See attached program).

6. That Mr. Burch's Probation Officer who monitors his home confinement, Lisa Tarquinio, has not responded to several voicemails left by counsel. Counsel also contacted the probation office and was told they would send her an email requesting a call, but that they could provide no information. At the time of filing counsel has received no response from Ms. Tarquinio.
7. That counsel for Mr. Burch has exchanged emails with Assistant United States Attorney Ankur Srivastava and he does not oppose the motion as long as Mr. Burch complies with all instructions from probation.

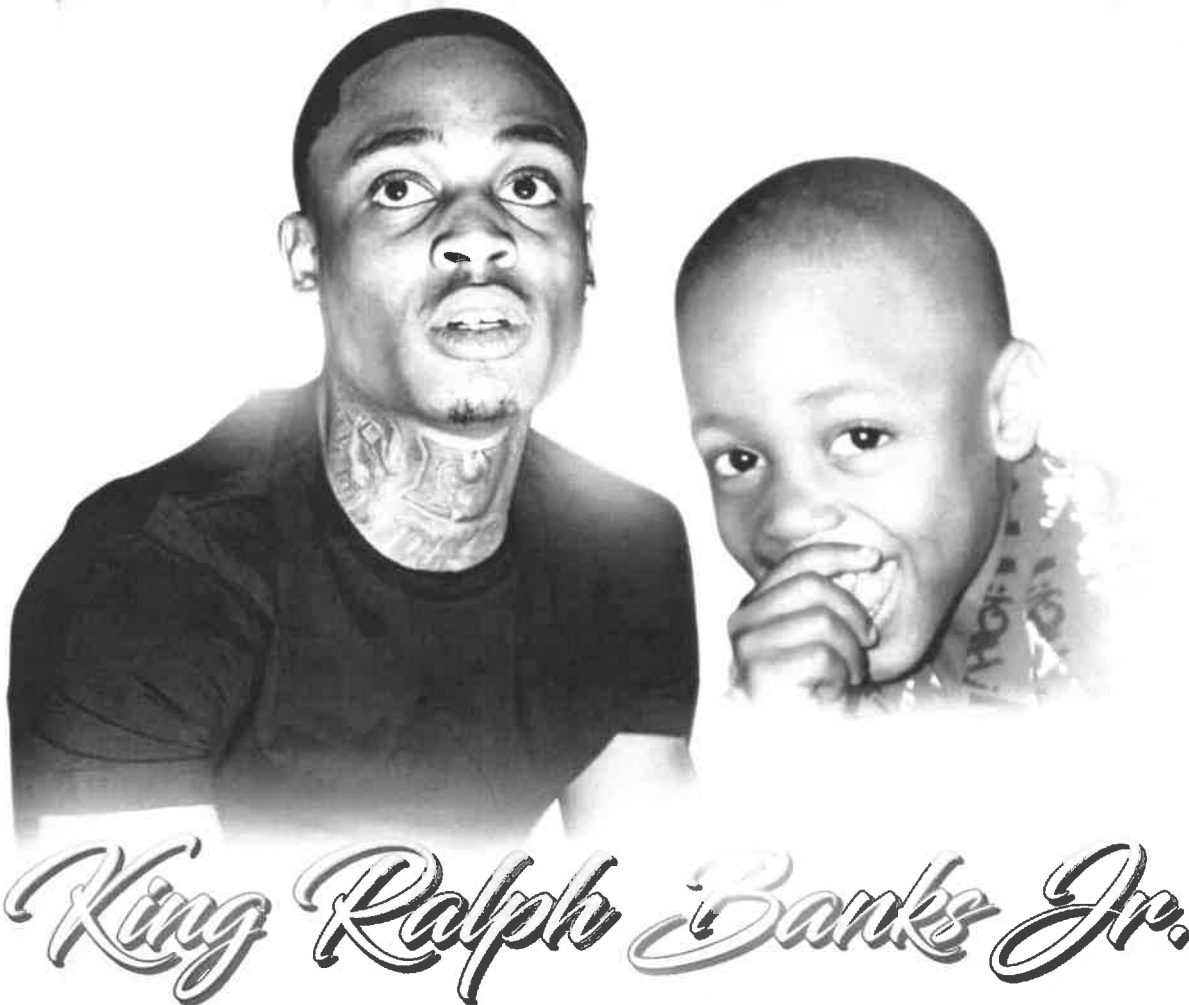
Wherefore, for the reasons stated above the defendant respectfully requests that his bond be modified as described above.

Respectfully submitted,

s/Steven R. Hunter
Attorney for the Defendant

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Celebrating
THE LIFE OF



SUNRISE SUNSET
06.16.1996 - 08.24.2021

SATURDAY, SEPTEMBER 4TH, 2021
FUNERAL SERVICE: 10AM-3PM - BURIAL & REPASS: 3PM-8PM

CORBIN COLONIAL FUNERAL CHAPEL
5345 W. MADISON ST. • CHICAGO, IL 60644



(BORN INTO LIFE) RALPH BANKS JR (LIL DUKE) WAS BORN TO ANITA THOMPSON MEEKS AND RALPH BANKS ON JUNE 16TH 1996 AT THE UNIVERSITY OF ILL

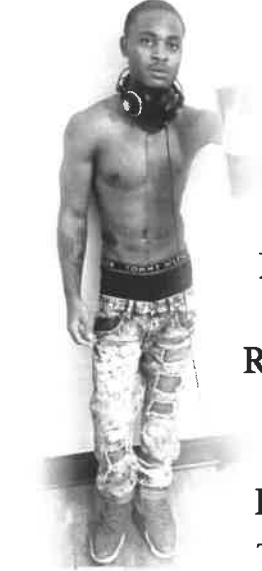
RALPH ATTENDED EVANSTON TOWNSHIP HIGHSCHOOL IN EVANSTON, IL

RALPH ENTERED INTO GOD HANDS ON AUGUST 24TH 2021 AT 12:49PM AT COOK COUNTY HOSPITAL IN CHICAGO IL

RALPH ENJOYED JOKING, LAUGHING, ARTS AND CRAFTS BUT MOST IMPORTANTLY HIS MUSIC. THAT WAS THE WAY HE RELEASED HIS SOUL WHEN HE GOT ON THE MIC HE WAS FREE AND IN HIS OWN WORLD HE WAS ABLE TO SHARE HIS GIFT WITH SO MANY PEOPLE HE WAS TRULY ONE OF A KIND.

RALPH WAS PRECEDED IN DEATH BY HIS (SISTER) RASHAWNDA BANKS, (GRANDMOTHER) NACY BANKS, (GRANDFATHER'S) JAMES SWIFT AND RALPH HUMBERT

RALPH LEAVES TO CHERISH IS HIS MOTHER, ANITA THOMPSON - MEEKS, FATHER RALPH BANKS AND STEPFATHER BYRON MEEKS, HIS FOUR BROTHERS RASHAWN KEYOIRY, NICKOLAS BURCH, DEMANI, AND LIL BYRON HIS THREE SISTERS, STEPHANIE, AZJHIA, AND JADA, HIS GRANDMOTHER'S HATTIE AND ETHEL, HIS LIFE PARTNER, TAMESHA AND STEP-DAUGHTER MAKAYLA, GODSON JONAH JAIMES. RALPH ALSO LEAVES A HOST OF COUSINS, AUNTS, UNCLES, FRIENDS, AND HIS "DAY DAY WORLD" FAMILY





Rashawn:

UNTIL WE MEET AGAIN, I LOVE YOU TWIN. FOREVER MY BROTHER'S KEEPER.



Mesha:

EVERYDAY THAT PASSES I MISS YOU MORE. I MISS OUR LITTLE CHATS AND YOUR KNOCK AT THE DOORS. I MISS THE WAY YOU LAUGHED, THE WAY YOU USED TO SMILE. I WOULD GIVE ALMOST ANYTHING TO HAVE YOU BACK A WHILE LIFE SEEMS OH SO EMPTY. SOMETHING SPECIALS MISSING I SEEM TO SPEND MY TIME REMINISCING YOU GAVE ME HAPPY MEMORIES THAT I WILL ALWAYS TREASURE I KNOW A DAY WILL COME WHEN WE TOGETHER AGAIN.
Forever yours Mesha



Stephanie:

NOBODY CAN REPLACE MY BROTHERS LOVE EVEN SO MANY FRIENDS COME AS BESTFRIENDS A BIG BROTHER IS BETTER THAN 1,000 FRIENDS.
LEGENDARY DUKE



Tori:

MY FIRST BIG BROTHER, I LOVE AND MISS YOU. YOU WILL FOREVER LIVE THROUGH ME. FOREVER DUKE



Khadya:

BROTHER,
MY HEART HAS BEEN LEFT BROKEN, SINCE THE DAY YOU HAD TO GO, AND THE MEMORIES I TREASURE DEARLY, ARE IN THE TEARS THAT STILL FLOW, YOU'RE IN MY THOUGHTS EVERYDAY, I REMEMBER WHEN YOU PICKED THAT COMPOSITION NOTEBOOK AND YOU START WRITING UNTIL EVERYTHING STARTED TO HOOK, I WILL ALWAYS LOVE YOU
Your big sister Khadya



Marveta:

Pallbearers

RASHAWN BANKS

SHANTEL GARTLEY

CORTEZ BANKS

LORENZO JONES

EUGENE JOINER

JOSE JAIMES

DARTAGNAN BURCH

SHYANTHONY PHILLIPS

TYRONE JONES

Acknowledgment

*The family of
Ralph Banks Jr.
would like to thank everyone
for their acts of kindness
during this time!*

PROFESSIONAL SERVICES ENTRUSTED TO:
CORBIN COLONIAL FUNERAL CHAPEL
5345 WEST MADISON ST.
CHICAGO, IL 60646

ALL SAINT CEMETERY
700 NORTH RIVER RD.
DESPAINES, IL 60616